

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Civil Action No. 2:23-cv-00641-JRG-RSP

JURY DEMANDED

**PLAINTIFF HEADWATER RESEARCH LLC'S REPLY IN SUPPORT OF ITS
MOTION TO AMEND INFRINGEMENT CONTENTIONS**

Samsung's response "does not oppose the present motion." Dkt. 51 at 1. Thus, Headwater's motion should be granted.

Headwater disagrees with any assertion that its amended contentions are deficient. *See, e.g.*, Dkt. 50 at 5-10 (addressing adequacy of amendments in its contentions); 10-14 (addressing purported deficiencies raised in Samsung's correspondence after meeting and conferring about Headwater's amendments). Nonetheless, Headwater remains open to discussing any questions or issues Samsung has regarding Headwater's amended contentions.

Accordingly, Headwater respectfully requests that the Court grant the instant motion for leave to amend Headwater's infringement contentions (Dkt. 50). While Samsung's response purports to reserve substantive objections, Samsung does not oppose the motion.

Dated: November 25, 2024

Respectfully submitted,

/s/ Marc Fenster

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CERTIFICATE OF SERVICE

I hereby certify that on November 25, 2024, I electronically filed the foregoing document with the Clerk of the Court for the Eastern District of Texas using the ECF System, and served defendants with a copy via ECF.

/s/ Marc Fenster

Marc Fenster